

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

MAR 23 2019

United States of America )

v. )

Julio Arturo SEGOVIA Jr. )  
(YOB: 1998, COB: U.S.) )Case No. M-19-0670-M

David J. Bradley, Clerk

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 22, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

8 U.S.C. § 1324(a)(1)(A)(ii)

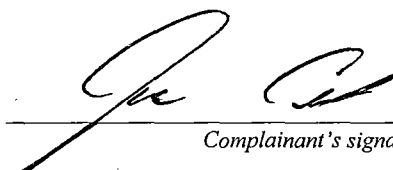
## Offense Description

Knowingly and in reckless disregard of the fact that aliens who had entered the United States in violation of law, did transport aliens, for the purpose of commercial advantage and private financial gain, by means of a private vehicle in furtherance of such violation of law within the United States, that is, from near Mission, Texas, to another location near McAllen, Texas

This criminal complaint is based on these facts:

SEE "ATTACHMENT A"

✓ Continued on the attached sheet.

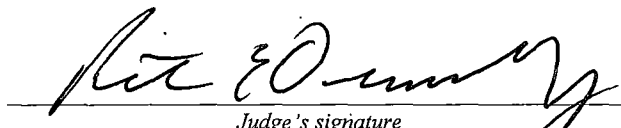


Complainant's signature

Jose G. Cervantes Jr., HSI TFO

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/23/20193:52 p.m.

Judge's signature

City and state: McAllen, Texas

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

**ATTACHMENT A**

I, Jose G. Cervantes Jr., am a Task Force Officer (TFO) assigned to the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On March 22, 2019, HSI TFOs observed a blue Dodge Avenger, which was suspected to be involved in alien smuggling activity, arrive at a motel near Mission, Texas. A Hidalgo County Constable's Deputy conducted a traffic stop on the Avenger for speeding and unsafe lane change. HSI TFOs assisted with the traffic stop. Due to the occupants in the vehicle having foreign identification documents HSI TFOs questioned them regarding their immigration status. Three of the occupants were determined to be illegally present in the United States and the driver, Julio Arturo SEGOVIA Jr was determined to be a United States Citizen (USC)
2. All subjects were transported to the McAllen Border Patrol Station to be processed.
3. SEGOVIA was read his Miranda Rights in his preferred language of English. SEGOVIA invoked his right to an attorney and did not provide a statement.
4. Alan BARAJAS-Meza and Saul BARAJAS-Meza were identified as material witnesses, both subjects were read their Miranda Rights in their preferred language of Spanish.
5. Post Miranda Alan BARAJAS-Meza provided the following non-verbatim statement:
  6. A. BARAJAS-Meza admitted to being a citizen of Mexico without any documents to legally enter, reside or work in the United States. A. BARAJAS-Meza stated he paid \$2,500.00 USD to be smuggled into the United States. A. BARAJAS-Meza stated he and his brother S. BARAJAS were kept at several locations and in various houses after being smuggled into the United States. A. BARAJAS-Meza stated that on March 21, 2019, he and his brother were transported to a hotel in the same blue sedan that they were apprehended in and were given money by the driver to pay for a room to spend the night. A. BARAJAS-Meza stated that he believes the driver that transported them to the hotel was the same driver that he was apprehended with today.
  7. A. BARAJAS-Meza stated that earlier today he and his brother S. BARAJAS-Meza were taken from the hotel and were going to be put in the air dam of a semi-tractor trailer, but that the driver felt someone was following him. A. BARAJAS-Meza stated that the driver then began to drive erratically and that he and his brother feared for their safety. A. BARAJAS-Meza stated that after the driver was stopped by law enforcement, the driver and the passenger Jorge Luis VARGAS-Carmona immediately broke their phones.
8. Post Miranda Saul BARAJAS-Meza provided the following non-verbatim statement:
  9. S. BARAJAS-Meza stated that he paid \$2,500.00 USD to be smuggled to Orlando, Florida to live with his relatives. S. BARAJAS-Meza stated that he and three other people were smuggled into the United States on or about March 12, 2019. S. BARAJAS-Meza stated that

after being smuggled into the United States, he and the group were initially transported in a red sedan. S. BARAJAS-Meza stated that he was taken to several different locations and that on March 21, 2019, they were transported to a hotel. S. BARAJAS-Meza stated that he and his brother A. BARAJAS-Meza were transported to that hotel in the same blue sedan they were arrested in and that the driver was possibly the same individual that was apprehended during today's smuggling attempt. S. BARAJAS-Meza also stated that the driver of the blue sedan gave him money to rent a room to spend the night in.

10. S. BARAJAS-Meza stated that today, he and his brother were transported from the hotel to look for a tractor trailer to be smuggled in. S. BARAJAS-Meza stated that after a while the driver stated that he felt he was being followed and that the driver began to go in and out of traffic and that he ran several traffic signs. S. BARAJAS-Meza stated that he began to fear for his safety and that he asked the driver to let him out of the vehicle. S. BARAJAS-Meza also stated that once they were pulled over by the police, the driver and the passenger of the vehicle broke their phones.